

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

JOHN BARNHARDT, et al.,)	
)	
Plaintiffs,)	
)	
and)	
)	
UNITED STATES OF AMERICA,)	Civil Action No. 4:65cv1300-HTW-LRA
)	
Plaintiff-Intervenor,)	
)	
v.)	
)	
MERIDIAN MUNICIPAL SEPARATE)	
SCHOOL DISTRICT, et al.,)	
)	
Defendants.)	
_____)	

**REPLY OF THE PLAINTIFF-INTERVENOR UNITED STATES TO DEFENDANT
MERIDIAN PUBLIC SCHOOL DISTRICT'S RESPONSE TO RULE 37 MOTION OF
THE PLAINTIFF-INTERVENOR UNITED STATES TO COMPEL DISCOVERY
RESPONSES**

Pursuant to Rule 7(b)(3)(A) of the Local Uniform Civil Rules of the United States District Courts for the Northern and Southern Districts of Mississippi, the Plaintiff-Intervenor United States hereby replies to the Response of the Defendant Meridian Public School District (the "District") as follows:

1. The Defendant's Response to the United States' Motion to Compel makes clear that the District has not provided the information sought in the United States' discovery requests. Response at ¶¶ 2, 3, 6, and 8.
2. As the United States stated in its Motion to Compel and accompanying Memorandum of Law in Support, the United States' discovery requests are relevant to the desegregation orders in

this case and are tailored to elicit information specifically related to the District's compliance with those desegregation orders.

3. A review of the District's response clearly indicates that its objections are without merit.

4. The United States incorporates by reference its Motion to Compel and accompanying Memorandum of Law in Support as if fully restated herein. Therefore, the United States stands on the position it articulated in its Motion to Compel and accompanying Memorandum of Law in Support, and requests that this Court compel the District to respond in full to the United States' First Set of Interrogatories and First Set of Document Requests.

Dated: August 18, 2011

Respectfully submitted,

JOHN M. DOWDY, JR.
United States Attorney

THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division
ANURIMA BHARGAVA, Chief
KATHLEEN S. DEVINE, Special Counsel
Educational Opportunities Section

s/Alfred B. Jernigan, Jr.
ALFRED B. JERNIGAN, JR.
Assistant United States Attorney

s/ Allison R. Brown
ALLISON R. BROWN
RYAN C. WILSON
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Educational Opportunities Section
Patrick Henry Building, Suite 4300
950 Pennsylvania Ave., NW
Washington, D.C. 20530
(202) 514-4092

CERTIFICATE OF SERVICE

I hereby certify that, on this date, August 18, 2011, I electronically filed the foregoing Reply of the Plaintiff-Intervenor United States with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Holmes S. Adams
Adams and Reese LLP
111 E. Capitol Street, Suite 350
Jackson, Mississippi 39225-4297

Fred L. Banks, Jr.
Phelps Dunbar LLP
4270 I-55 North
Jackson, MS 39211-6391

s/Alfred B. Jernigan, Jr.
ALFRED B. JERNIGAN, JR.